# DEPARTMENT OF CHILDREN AND FAMILIES

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TO: W-2 Agencies

**Training Staff** 

FROM: Margaret McMahon, Director Bureau of Working Families

Division of Family and Economic Security Department of Children and Families

BWF OPERATIONS MEMO
No: 15-07

DATE: 05/11/2015

W-2 🖂 EA 🗌 CF 🗌 JAL 🔲 RAP 🔲 Other EP 🗌

SUBJECT: Wisconsin Works (W-2) Access to Equifax Data to Verify Earned

Income

CROSS REFERENCE: None

**EFFECTIVE DATE:** June 8, 2015

# **PURPOSE**

The purpose of this memo is provide information about a new data exchange process that Financial and Employment Planners (FEP) may use to verify earned income for W-2 participants when there is an existing health care request on a CARES Worker Web (CWW) case.

### **BACKGROUND**

Provisions in the Patient Protection and Affordable Care Act of 2010 require states to rely as much as possible on electronic data sources when verifying information provided by health care applicants. The Federal Data Services Hub (FDSH) provides states with a variety of data exchanges, including real-time verification of earnings based on data from Equifax (previously known as TALX or The Work Number). This service is available to states free of charge through the FDSH, but may only be used to verify earned income when there is a health care request on a CWW case.

Starting June 8, 2015, Wisconsin will implement this data exchange as a source of earned income verification for applicants and members with a health care request in CWW. FEPs may view Equifax information from the FDSH and use it as trusted data source for verifying earned income when the information matches what the W-2 participant has reported.

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While the data provided through Equifax is expected to be as current and reliable as the participant's most recent paystubs, data matches will only be available for individuals employed by larger companies that opt to use Equifax for reporting wages.

#### **CARES**

# **Employment Queries Page**

To support the new FDSH data exchange, the existing CWW Employment Queries page will be enhanced to display the income information received from FDSH. If there is a health care request on the case, the new FDSH data exchange will be queried automatically during the W-2 intake, review, and person add driver flows so that data is available when the FEP comes to this page.

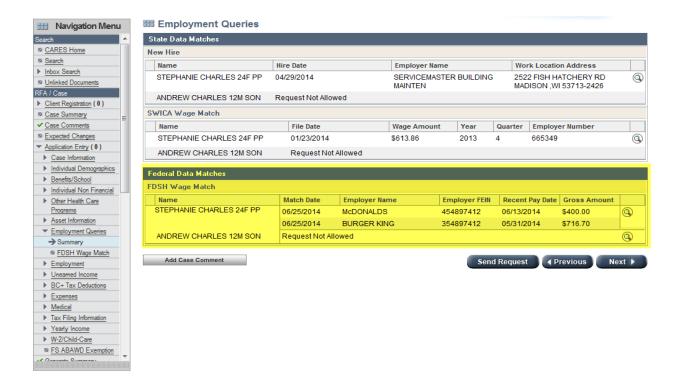
The Employment Queries page is now divided into two sections:

- State Data Matches: this will include both the New Hire and SWICA Wage Match, which will be renamed from "Wage Match" section to "SWICA Wage Match".
- Federal Data Matches: this will include the FDSH Wage Match with information from Equifax.

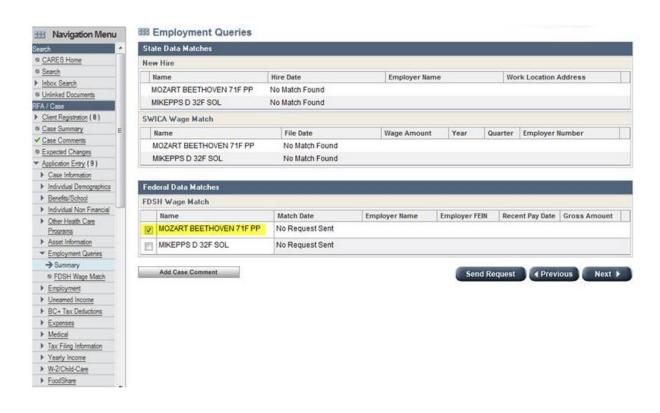
FEPs may click the magnifying glass for an individual to view the detailed FDSH Wage Match results. For individuals under age 14, the page will display the message "Request not allowed." If no match is found for an individual age 14 or older, the page will display the message "No data found." As noted above, the FDSH wage match will only be allowed for cases with a health care request.

➤ **Note:** The FDSH Wage Match will include wage data for any W-2 group members who are 14 years of age and older. However, FEPs must disregard a dependent's earned income when determining eligibility for the W-2 group. (W-2 Manual, Section 3.2.9.1)

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FEPs will also be able to query the FDSH data base when not in a driver flow by navigating to the page and checking the box next to the individual's name and clicking Send Request. The check boxes will appear if the FDSH query has not been run on the day that the FEP navigates to this page.



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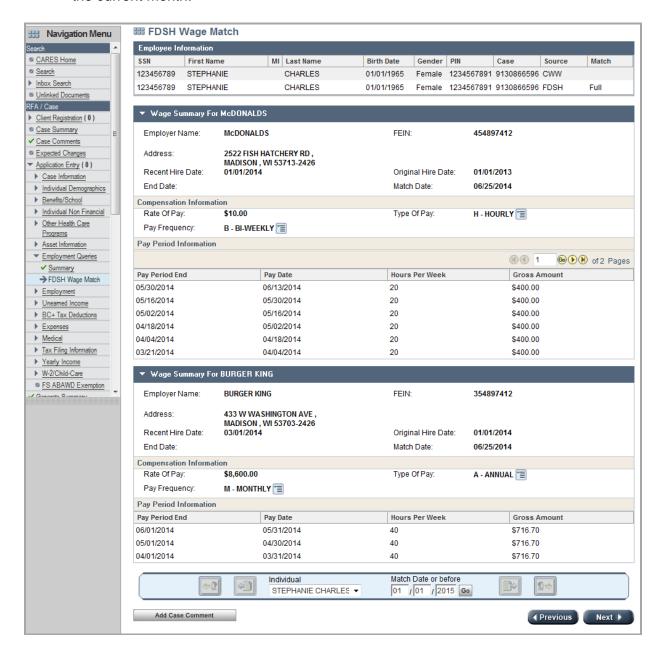
# FDSH Wage Match Page

FDSH Wage Match is a new CWW page that displays any FDSH information available for that individual. This page is not part of the CWW driver flow but can be viewed by:

- 1. Clicking on the magnifying glass under the FDSH Wage Match section on the Employment Queries page;
- 2. Clicking on the new FDSH Wage Match link in the left navigation menu; or
- 3. Clicking on the FDSH Wage Lookup magnifying glass on the Employment Page

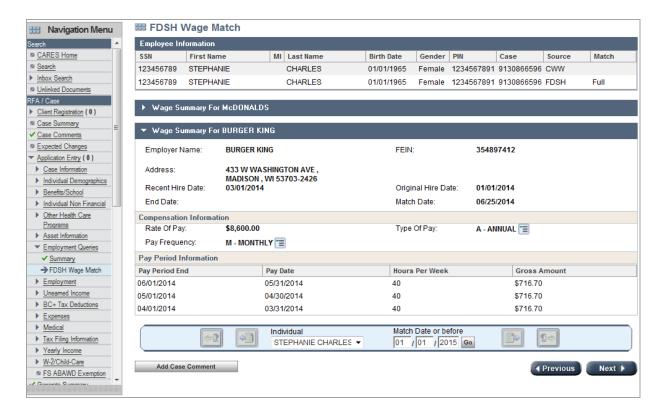
This is a view-only page and may be displayed as follows:

A. Expanded view - income details will be shown for all the employments with matching information from the FDSH, but the Wage Summary sections will be defaulted to expand only for employments in which the most recent pay date is in the three months prior to the current month.



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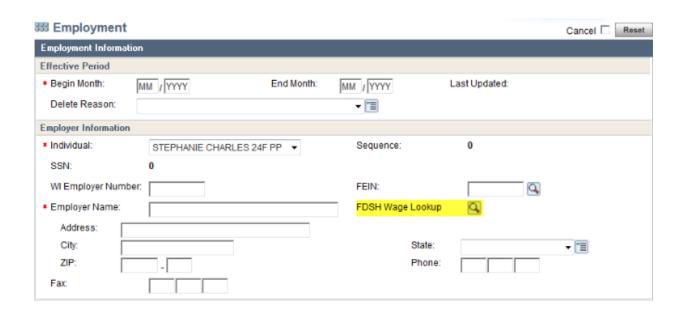
B. Collapsed view – the page will display the Wage Summary sections in collapsed mode if the most recent pay date for that employment is more than three months prior to the current month.



### **Employment Page**

The Employment page will be updated to provide the option of looking at the income details received from FDSH for an individual employment. A new look-up link, called the FDSH Wage Lookup, will be added below the Employer FEIN field in the Employment Information section. A pop-up window version of the FDSH Wage Match page will appear when the FEP clicks the magnifying glass. When viewing the Employment Pages in history, the FDSH Wage Match page will display the information that was available as of the "Last Updated" date on the page.

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## CWW Instructions on Use of Equifax Data as Source of Verification

The Centers for Medicare and Medicaid Services (CMS) has directed the Wisconsin Department of Health Services that it may not consider income reported via the FDSH Data Exchange to be "verified upon receipt" unless it matches what the health care member has reported. This direction is consistent with the W-2 Eligibility Verification policy in the W-2 Manual, Section 4.1.1 and, therefore, W-2 agencies must also follow this requirement.

- A. If the participant reports receiving earned income that matches what is being reported through the FDSH Data Exchange, the FEP must record a "DE" verification code to indicate the verification was from a data exchange.
- B. If the participant reports receiving earned income that does not match what is reported through the FDSH Data Exchange, then the Data Exchange must not be used as the source of verification. If verification is not available in ECF, the FEP must request verification that will support the participant's reported income amount. In CWW, the FEP must record a "?" in the earned income verification field to pend W-2 eligibility.
  - If the participant provides the requested verification, the FEP must change the verification code to "ER", to indicate the verification source was an employment record.
  - If the participant fails to provide verification and does not contact the agency to request help with obtaining the verification, the FEP must record "NV" to indicate Not Verified in the verification field to fail W-2 eligibility.
  - If the participant contacts the agency to request help with obtaining the verification, the FEP must follow policy under W-2 Manual, Section 4.1.3.

#### **CONTACTS**

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

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For W-2 CARES Processing Questions: W-2 Help Desk

DCF/DFES/BWF/HH